

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:
SANDRA MARIA DE FATIMA SEDA
BARLETTA
Debtor

CASE NO. 19-02177 MCF
CHAPTER 13

REPLY TO TRUSTEE'S REPORT ON CONFIRMATION OF PAYMENT PLAN

TO THE HONORABLE COURT:

COMES NOW, Debtor through the undersigned counsel and before this Court most respectfully states and prays:

1. Before the court is Debtor's amended payment plan dated September 25, 2020. Trustee has filed an unfavorable report on confirmation of payment plan citing the following issues, to wit¹:

- a) Per document uploaded by Debtor to Trustee system regarding the State Court litigation status, the court is requesting an additional order from the Bankruptcy Court to allow further proceedings to continue in that case. Debtor to address this matter accordingly;
- b) Pending motion to dismiss case and objection to confirmation filed by creditor Ms. Isabel de la Torre.

2. Debtor hereby submits that issues stated in Trustee's report on confirmation at docket 55 have been or are addressed as follows:

- a) Debtor has moved for an order to allow proceeding before the State Court to continue and an order to such effect has been entered, See Docket Nos. 62 & 63;
- b) Debtor has replied to the motion to dismiss case filed by creditor Mrs. Isabel de la Torres, See Docket No. 61.

WHEREFORE, Debtor respectfully requests that this Court take note of the above mentioned in response to Trustee's report on confirmation at docket 55.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico this 12th day of November, 2020.

I HEREBY CERTIFY: That a true copy of the instant motion has been forwarded via the Court

¹Docket No. 44

electronic filing system to Chapter 13 Trustee at his registered address of record and all other parties participating in the CM/ECF system.

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